

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

RECORD REQUEST: D.T.E. Record Request 24, to AT&T

DATE: January 18, 2002

RR-DTE-24 This request concerns the activities described in lines 18, 21, 24 and 27 of the RCCC activity description in NRC Exhibit G to Verizon's direct testimony. Which of these activities does AT&T use or want in order to conduct business in Massachusetts? Will this use or want continue in the foreseeable future?

RESPONSE: AT&T first notes that in the current network environment these four activities take place in connection with the migration of an existing UNE-Loop to a CLEC, performed today as a coordinated "hot cut", but do not take place in connection with the provisioning of a new UNE-Loop. *Compare* Verizon MA NRC Model Workpapers Tab 1 ("Two Wire New Initial" orders) with Tab 3 ("Two Wire Migration"). Verizon shows a zero percent occurrence of these work activities under Tab 1, with respect to orders for new loops.

The current coordinated hot-cut process was developed to eliminate repeated errors committed by Verizon in migrating loops in New York, as a result of glitches within its Operations Support Systems and its line provisioning practices. These errors caused many customers to lose dial tone and service altogether after signing up with a CLEC. Because Verizon proved incapable of successfully implementing an uncoordinated hot cut process when first learning how to provision unbundled loops to CLECs, it became necessary to implement the present coordinated hot cut process to avoid service outages caused by Verizon errors.

However, the problems that were experienced in the present network environment and the resulting, current hot-cut provisioning practices between Verizon and CLECs are not relevant to the setting of TELRIC-compliant rates in this proceeding. Those rates must be set for a forward-looking network environment, under the assumption that Verizon will have fixed its OSS databases and that it will follow

RESPONSE:
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best and most efficient provisioning practices. As the testimony of AT&T witness Richard J. Walsh makes clear, the most efficient means of provisioning unbundled loops in the forward-looking environment relevant to the setting of TELRIC-compliant rates would be an uncoordinated, but no less accurate, hot-cut migration process.

In sum, at present and under Verizon's current network environment AT&T does have a need for the activities referenced in the Department's request, which are all part of the current procedures for coordinated hot cuts. However, AT&T looks forward to the day when Verizon is able to ensure the accuracy of its line assignment data bases and update its provisioning practices to perform less costly, but no less accurate, uncoordinated hot cuts. As soon as Verizon is able to improve its provisioning practices and cooperate with CLECs in establishing an uncoordinated hot-cut process, the need for these activities should soon dissipate. That is the efficient, forward-looking environment that under the FCC's pricing rules must be the basis for setting non-recurring charges in this proceeding.